

Bentley J. Tolk (6665) [btolk@parrbrown.com](mailto:btolk@parrbrown.com)  
Terry E. Welch (5819) [twelch@parrbrown.com](mailto:twelch@parrbrown.com)  
Rodger M. Burge (8582) [rburge@parrbrown.com](mailto:rburge@parrbrown.com)  
C. Chase Wilde (17546) [cwilde@parrbrown.com](mailto:cwilde@parrbrown.com)  
PARR BROWN GEE & LOVELESS  
101 South 200 East, Suite 700  
Salt Lake City, Utah 84111  
Telephone: (801) 532-7840  
Facsimile: (801) 532-7750

*Attorneys for Kevin Long*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

PATTI KLAIR, ROBERT MYERS,  
ROBERT BARNES, ERIC CARNRITE,  
ELIZABETH HILL-D'ALESSANDRO,  
ROBERT TANNEHILL, DITAS  
TANNEHILL, JOSE REMENTERIA,  
TEENA REMENTERIA, CHARLES  
BRAUER, LAURA BRAUER, KAREN  
MARION, KATHERINE MADERA, CARL  
MCQUEARY, LYNN MCQUEARY,  
DONALD PATTERSON, KURTIS TRENT  
MANNING, TONY SCHAKER, PATRICK  
WHITE, HILDEGARD WHITE, QUEST  
REALTY TRUST, SECURE STORAGE  
LLC, KURTIS TRENT MANNING LIVING  
TRUST,

Plaintiffs,

vs.

KEVIN LONG, MILLCREEK  
COMMERCIAL, LLC, COLLIER'S  
INTERNATIONAL, ANDREW BELL,  
TREVOR WEBER, SPENCER TAYLOR,  
BLAKE McDUGAL, SCOTT  
RUTHERFORD, EQUITY SUMMIT  
GROUP, ELEVATED 1031,

Defendants.

**STIPULATED MOTION  
TO EXTEND DEADLINE FOR KEVIN  
LONG TO ANSWER OR RESPOND TO  
PLAINTIFFS' FIRST AMENDED  
COMPLAINT**

Case No: 2:23-cv-00407-AMA-CMR

Judge Ann Marie McIff Allen

Magistrate Judge Cecilia M. Romero

It is hereby stipulated, agreed, and jointly moved by and between Plaintiffs and Defendant Kevin Long, to extend the deadline to respond to Plaintiffs' First Amended Complaint (Dkt #114) (the "Complaint") until after Plaintiffs' pending motion for leave to file Second Amended Complaint is resolved. (*See* Dkt. #118, the "Motion".) Kevin Long does not plan to oppose the Motion, and it is expected that it will be granted, meaning Plaintiffs the Second Amended Complaint will become the operative complaint in this matter.

Should the Motion be granted, then any answer or response to the First Amended Complaint would be moot. Should the Motion be denied, then the Plaintiffs and Defendant Kevin Long stipulate that Long will answer or otherwise respond to the First Amended Complaint within seven days of the Motion being denied.

Good cause exists for the requested extension for the reasons above, and because both the First and Second Amended Complaint contains hundreds of allegations, and answering the First, only to have to answer the Second after the Motion is granted would be inefficient.

This motion is timely because the April 09, 2025 deadline to answer or otherwise respond to the First Amended Complaint has not expired.

A copy of the proposed Order Extending Deadline for Kevin Long to Answer or Respond to Plaintiffs' First Amended Complaint is attached as Exhibit "A."

DATED this 9<sup>th</sup> day of April, 2025.

**PARR BROWN GEE & LOVELESS**

By: /s/ Bentley J. Tolk

Terry E. Welch

C. Chase Wilde

Rodger M. Burge

Bentley J. Tolk

*Attorneys for Defendant Kevin Long*

**DEISS LAW P.C.**

By: /s/ Corey D. Riley  
Corey D. Riley

*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 9<sup>th</sup> day of April, 2025, I caused to be served a true and correct copy of the foregoing **STIPULATED MOTION TO EXTEND DEADLINE FOR KEVIN LONG TO ANSWER OR RESPOND TO PLAINTIFFS' FIRST AMENDED COMPLAINT** via the CM/ECF system, which automatically provided notice to all counsel of record.

\_\_\_\_\_  
/s/ Bentley J. Tolk